

SARA H. LUBKIN
2312 Bellow Court
Crofton, Maryland 21114

Plaintiff

v.

TARGET CORPORATION
2384 Brandermill Boulevard
Gambrills, Maryland 21202

-Serve On-

THE CORPORATION TRUST, INC.
2405 York Road, Suite 201
Lutherville, Maryland 21093

Defendant

* IN THE
*
* CIRCUIT COURT
*
* OF MARYLAND
*
* FOR
*
* ANNE ARUNDEL COUNTY
*
* CASE NO.: C-02-CV-21-000180

* * * * *

COMPLAINT

NOW COMES Sara H. Lubkin, Plaintiff, by and through her attorneys, Jason A. Plotkin, Esq., Stefanie L. Burton-Bragg, Esq., and Pinder Plotkin LLC., and brings suit against Target Corporation, Defendant, and for cause states:

PREAMBLE

1. The Plaintiff, Sara H. Lubkin, is a resident of Anne Arundel County, Maryland.
2. The Defendant, Target Corporation, is a Maryland business doing business in Anne Arundel County, Maryland.
3. The incident occurred in Anne Arundel County, Maryland.

STATEMENT OF FACTS

4. That on or about January 3, 2020, Plaintiff, Sara H. Lubkin, entered Defendant, Target Corporation, located at 2384 Brandermill Boulevard, Gambrills, Maryland 21054 with the intent to purchase items offered for sale by Defendant. While the Plaintiff took an

item off a display, suddenly and without warning overstocked items fell onto the Plaintiff. Said items struck her in the back of her head.

5. That Plaintiff was a business invitee lawfully on the premises of Defendant, Target Corporation, location at 2384 Brandermill Boulevard, Gambrills, Maryland 21054.
6. That the premises were at all times mentioned herein under the control of the Defendant, Target Corporation.
7. That the Defendant, Target Corporation, its agents, servants, and/or employees, were responsible for maintenance and/repairs to the premises.
8. That the Defendant, Target Corporation, its agents, servants, and/or employees, were responsible for merchandising and stocking items for sale at the premises.
9. That the Defendant, Target Corporation, its agents, servants, and/or employees, had previously performed maintenance on the premises.
10. That the Plaintiff was not contributorily negligent and did not assume the risk of being injured while on said property.

COUNT 1 – NEGLIGENCE v. TARGET CORPORATION

11. That Plaintiff, Sara H. Lubkin, hereby adopts and incorporates by reference all the facts and allegations in paragraphs 1 through 10, and further avers that the incident aforesaid was due to the negligence of the Defendant, Target Corporation, for that in this and other manners:

- a. failure to exercise reasonable care;
- b. failure to properly stock and/or merchandise products;
- c. failure to properly inspect premises;
- d. failure to take adequate safety precautions;

- e. failure to comply with recognized safety regulations and industry practices;
- f. failure to comply with a statute or ordinance;
- g. negligent design and construction defects;
- h. failure to disclose a dangerous condition;
- i. negligent hiring; and
- j. such other conduct to be shown at Trial.

12. That at all times the Defendant, Target Corporation, knew that the invitees, guests and licensees using the premises in general, and that the Plaintiff, in particular, would rely on the Defendant, Target Corporation, to maintain the premises in a reasonable manner and to notify them of dangerous conditions.


13. That as a direct result of Defendant, Target Corporation, negligence, the Plaintiff, Sara H. Lubkin, was injured as a result of the recklessness, incautious, or otherwise negligently stocked and/or merchandised products, whereby, she sustained sever and permanent injuries; and she sustained further and still suffers great physical pain and mental anguish.

14. That as a consequence of the Plaintiff's injuries, she received and continues to receive medical care and treatment by hospitals and physicians and was caused to incur great medical expense.

15. That as further result of the Plaintiff's permanent injuries and resulting infirmities she has been precluded from engaging in her usual activities and duties, and will be otherwise hurt, injured, damaged and caused to suffer other losses, including future medical care and lost wages.

16. That the Plaintiff avers that all of her injuries, losses and damages, past, present and prospective, were, are and will be due to the negligence of the Defendant, Target Corporation, without any negligence or want of due care on the part of the Plaintiff thereunto contributing.

WHEREFORE, the Plaintiff, Sara H. Lubkin, brings this action against Defendant, Target Corporation, and claims damages in excess of Seventy-Five Thousand Dollars (\$75,000.00).



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PRAYER FOR JURY TRIAL

Dear Sir or Madam Clerk,

The Plaintiff prays a jury trial on all issues in the case at bar.

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